

# **EXHIBIT 241**

**FACTORS IN SUPPORT OF TWO YEARS SEVERANCE PAYMENT:**

- It is difficult to have identify comps as the combined existence of Financial Trust and Southern Trust, with the same employees, has no peer group
- As such, all the employees were loyal to Jeffrey Epstein, while acknowledging that when the current EDC benefit certificate expired, they may not have the same employment – but would be secure for the intervening three years
- Based on our market research of EDC companies (COOs, CFOs, managers, compliance officers) the base salary ranged from \$200k to \$250k plus bonus awards; the base salaries of the comparable position for us at FTC and STC
- Based on above bullet, of a lower base salary, loss of the three-year security and no raises since 2013, we are put a further disadvantage to the loyalty that was exhibited
- Unlike other employee separations that occur when a company closes or relocates, our association with FTC and STC will continue through the on-going legal actions, local investigations – with calls, visits, media stories. The unintended consequences to us and our families are unknown.
- Most recently Darren and Jeffrey Epstein when arrested in 2006 provided personal assurances that these allegations were unfounded.
- The requested severance is not a pay-off but an acknowledgement of our tenure with the company and its early dissolution while we transition to other employment. (Cannot be seen as a pay-off as we were not complicit in any acts)
- While not easy to admit – as a consequence of living in a small community, having worked for a high-profile individual and given the current issues and circumstances, our association with Jeffrey Epstein will make it unlikely that we will get employment in the near term.